Remarks

Applicant submits this Reply to the Office Action mailed April 3, 2008. By this Reply, Applicant has amended claims 1, 10, 18, and 22. Accordingly, claims 1-24 remain pending. The originally-filed specification, drawings, and claims fully support the subject matter of amended claims 1, 10, 18, and 22. Thus, the Reply introduces no new matter.

In the Office Action, claims 1, 2, 4, 6-11, 13, and 15-24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,727,898 to Hariya et al. ("Hariya") in view of U.S. Patent No. 6,219,049 to Zuffante et al. ("Zuffante"); and claims 3, 5, 12, and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Hariya and Zuffante, and further in view of U.S. Patent No. 5,745,113 to Jordan et al. ("Jordan"). Applicant respectfully traverses these rejections for at least the reasons stated below.

To establish a *prima facie* case of obviousness based on a combination or suggestion of prior art, "Office personnel must articulate . . . a finding that the prior art included each element claimed, although not necessarily in a single prior art reference, with the only difference between the claimed invention and the prior art being the lack of actual combination of the elements in a single prior art reference." M.P.E.P. § 2143A (8th edition, revision 6). Applicant respectfully requests withdrawal of the Section 103(a) rejection because Hariya and Zuffante, either alone or in combination, fail to disclose or suggest each and every element of the claimed invention.

For example, with respect to independent claim 1, Hariya fails to disclose, among other things, "wherein a first interface element of said property input window includes at

least one of an interval count field indicative of a number of mesh entities that will

directly fill said selected entity, an interval size field indicative of a size of said mesh

entities that will directly fill said selected entity, an interval set field indicative of a

circumstance under which said interval fields may be modified, a mesh scheme field

indicative of a desired mesh scheme and a smooth scheme field indicative of a process

of improving an element quality after a mesh generation." Hariya states that

> the present invention provides a numerical analysis mesh
> generating method comprising the steps of inputting a
> geometric model under analysis, selecting a verification
> model having the geometry analogous to the geometric
> model, corresponding the geometric model to the verification
> model in terms of the geometry, reading a previously created
> mapping model approximated from the verification model
> with a lattice, modifying the mapping model of the verification
> model using a geometric correspondence between the
> geometric model and the verification model to create a
> mapping model for the geometric model, and mapping lattice
> points in the created mapping model for the geometric model
> to the geometric model to create a numerical analysis mesh.

Hariya, col. 2, ll. 19-32. Hariya adds that "[t]he analysis mesh creator 3 creates a

mapping model which approximates a geometric model previously registered in the

model database 6 with an orthogonal lattice, and registers it in the model database as

mapping model data 62." Hariya, col. 53-56. In other words, Hariya maps lattice points

in the created mapping model for the geometric model to create a numerical analysis

mesh. In contrast, independent claim 1 recites "wherein a first interface element of said

property input window includes at least one of an interval count field indicative of a

number of mesh entities that will <u>directly</u> fill said selected entity, an interval size field

indicative of a size of said mesh entities that will <u>directly</u> fill said selected entity, an

interval set field indicative of a circumstance under which said interval fields may be

modified, a mesh scheme field indicative of a desired mesh scheme and a smooth

scheme field indicative of a process of improving an element quality after a mesh

generation" (emphasis added).

Zuffante fails to remedy this deficiency. Indeed, the Office Action does not rely

on Zuffante to teach or suggest the above discussed deficiencies of independent claim

1. Instead, the Office Action alleges that Zuffante "teaches the property input window

being separate from the parent graphics." Office Action at 3. Even assuming this

allegation is correct, which Applicant does not concede, it does not constitute a teaching

of the above recitation of claim 1. Accordingly, a combination of Hariya and Zuffante

fails to present a *prima facie* case of obviousness. Applicant respectfully requests

withdrawal of the Section 103(a) rejection of claim 1 and its dependent claims 2, 4, and

6-9.

Similarly, Applicant submits that Hariya fails to anticipate independent claim 10.

Claim 10 recites, among other elements, "wherein first interface element of said

property input window includes at least one of an interval count field indicative of a

number of mesh entities that will directly fill said selected entity, an interval size field

indicative of a size of said mesh entities that will directly fill said selected entity." As

fully developed above in connection with claim 1, Hariya and Zuffante, either alone or in

combination fail to disclose or suggest the above features. Accordingly, Applicant

requests withdrawal of the Section 103(a) rejection of claim 10 and its dependent claims

11, 13, and 15-17.

Regarding independent claim 18, similar to the arguments above, Hariya and

Zuffante, either alone or in combination fail to present a prima facie case of

obviousness. For example, among other things, a combination of Hariya and Zuffante, does not disclose or suggest "attaching a child window to said parent window for directly manipulating the image." As noted above in connection with claim 1, Hariya maps lattice points in the created mapping model for the geometric model to create a numerical analysis mesh. Hariya does not disclose or even suggest the above recitation. Moreover, Zuffante fails to remedy this deficiency. Accordingly, Applicant requests withdrawal of the Section 103(a) rejection of claim 18 and its dependent claims 19-21.

Similarly, independent claim 22 also recites among other things, "attaching a child window to said parent window for directly manipulating the image." As discussed, Hariya and Zuffante, either alone or in combination, fail to disclose or suggest the above feature. Accordingly, Applicant requests withdrawal of the Section 103(a) rejection of claim 22 and its dependent claims 23 and 24.

With respect to the 35 U.S.C. § 103(a) rejection of claims 3, 5, 12, and 14 as being unpatentable over Hariya and Zuffante, and further in view of Jordan, Jordan does not cure the shortcomings noted above regarding Hariya. Thus, a combination of Hariya, Zuffante, and Jordan fails to present a *prima facie* case of obviousness. Indeed, the Office Action does not rely on Jordan for disclosing or suggesting "wherein a first interface element of said property input window includes at least one of an interval count field indicative of a number of mesh entities that will directly fill said selected entity, an interval size field indicative of a size of said mesh entities that will directly fill said selected entity, an interval set field indicative of a circumstance under which said interval fields may be modified, a mesh scheme field indicative of a desired mesh

scheme and a smooth scheme field indicative of a process of improving an element quality after a mesh generation," as recited in independent claims 1 and 10, although of varying scopes. Instead, the Office Action alleges that Jordan "teaches a device comprises attaching a textual input window to said parent graphics window wherein first interface element of said textual window includes a command line for entry of textual commands for said finite element analysis application execution." Office Action at 7. Even assuming this allegation is correct, which Applicant does not concede, it does not constitute a teaching of the recitations of claim 1 and 10 missing from Hariya and Zuffante as set forth above. As claims 3 and 5 depend from claim 1, and claims 12 and 14 depend from claim 10, these dependent claims are allowable for at least the same reasons that claims 1 and 10 are allowable.

The Office Action contains characterizations of the claims and the related art with which Applicant does not necessarily agree. Unless expressly noted otherwise, Applicant declines to subscribe to any statement or characterization in the Office Action.

In discussing the specification, claims, and drawings in this Reply, it is to be understood that Applicant is in no way intending to limit the scope of the claims to any exemplary embodiments described in the specification or abstract and/or shown in the drawings. Rather, Applicant is entitled to have the claims interpreted broadly to the maximum extent permitted by statute, regulation, and applicable case law.

In view of the foregoing remarks, Applicant submits that this claimed invention, as amended, is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicant therefore requests the Examiner's
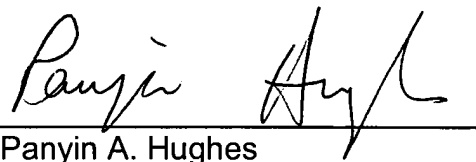
reconsideration and reexamination of the application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our Deposit Account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: July 2, 2008   By:_____
                                            Panyin A. Hughes
                                            Reg. No. 55,288